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March 31, 2025

BY ECF

Hon. Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Kevin Gao, 25 CR 53 (PAE)

Dear Judge Engelmayer:

I am writing on behalf of defendant Kevin Gao to respectfully request a modification of the defendant's conditions of pretrial release which would permit him to travel to Saugerties, New York from April 14 through April 16, 2025 in order to take his children camping. The government, by AUSA Christopher Brumwell, and Pretrial Services, by USPSO Taelor Nisbeth, both have no objection to this application. If approved, Mr. Gao would provide Pretrial Services with a detailed itinerary of his trip.

By way of background, on February 13, 2025, Mr. Gao was released on a \$150,000 personal recognizance bond by Judge Aaron, co-signed by two financially responsible persons, and with conditions, *inter alia*, limiting his travel to the Southern and Eastern Districts of New York, and the District of New Jersey. Since that time, Mr. Gao has remained compliant with his conditions of release.

Thank you for the Court's consideration of this application; I remain available for a conference should Your Honor deem it necessary.

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 12.

SO ORDERED.

3/31/2025


PAUL A. ENGELMAYER

United States District Judge

cc: All counsel (by ECF)
USPO Taelor Nisbeth (by email)

Respectfully submitted,


Jeffrey Einhorn